

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CELESTE J. MATTINA, Regional Director, Region 2,  
National Labor Relations Board, for and on behalf of the  
NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

KINGSBRIDGE HEIGHTS REHABILITATION  
AND CARE CENTER,

Respondent.

**DECLARATION OF NINA  
KUTSENKO**

**Civil Action No:  
08-CV-6550 (DLC)  
ECF CASE**

I, NINA KUTSENKO, hereby declare, under penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am an activities worker for Respondent, Kingsbridge Heights Rehabilitation and Care Center ("Kingsbridge") at its Bronx, New York facility. I am familiar with the facts and circumstances surrounding this action and submit this Declaration in Opposition to Petitioner's Petition for Temporary Injunction under Section 10 (j) of the National Labor Relations Act.

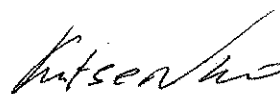
2. I have been the target of severe harassment, assault, and intimidation by striking members of 1199 SEIU.

3. On April 3, 2008 striking members of the SEIU threw eggs at me while I was walking past the facility.

4. One week later, one of the strikers followed me to work and threw soda on me.

5. Thereafter, a coworker named Nakeysa and I were confronted by a striking worker named Alejandra. Nakeysa asked Alejandra to leave me alone, and then I observed Alejandra attack Nakeysa. She jumped on her and began pulling her hair. The two women fought until three men ran over and separated them.

EXECUTED ON THE 5 DAY OF AUGUST, 2008.

A handwritten signature in black ink, appearing to read "Kutsenko", written over a horizontal line.

NINA KUTSENKO